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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	CASE NO: CR 15-518 RS
)	
Plaintiff,)	STIPULATION AND PROPOSED PROTECTIVE
)	ORDER REGARDING DISCOVERY OF
v.)	SENSITIVE INFORMATION
)	
ROBERT JACOBSEN,)	
)	
Defendant.)	
)	
)	

Defendant is charged in a twenty-two count indictment with wire fraud and with engaging in financial transactions involving the proceeds of specified unlawful activity. Pursuant to defendant's request for discovery, the United States will produce to defendant media compiled as part of this investigation. This media includes personal identifying information of individuals other than the defendant. Because some of this material is relevant to the government's case against defendant and because redacting it would be impractical, the parties stipulate, and the Court orders, that disclosure of these materials shall be subject to the following restrictions:

1. All materials produced by the United States in this case and containing personal identifying information (including but not limited to social security numbers, home addresses, bank account numbers, credit card numbers, or other financial account numbers) belonging to individuals other than defendant shall be labeled "protected material."

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2. Except when being actively examined for the purpose of the preparation of the defense of defendant, any protected material (including copies of print-outs of digital media) produced by the United States to defense counsel, Doron Weinberg, shall be maintained in an office accessible only to Mr. Weinberg, employees of Mr. Weinberg, or escorted guests. Mr. Weinberg shall not permit any person access of any kind to the protected material except as set forth below.

3. The following individuals may examine protected material and copies of print-outs thereof for the sole purpose of preparing the defense or sentencing, of the defendant and for no other purpose:

- a) Counsel for the defendant, Doron Weinberg;
- b) Paralegals, assistants, and investigators employed by Mr. Weinberg as part of this case;
- c) The defendant Robert Jacobsen, but only in the presence of his attorney;
- d) Any outside expert retained by the defendant to analyze the media in this matter; and
- e) US Probation.

If defense counsel determines that additional attorneys, experts, paralegals or investigators are needed to review the material, he must obtain a further order of the Court before allowing any other individual to review the material.

4. A copy of this Order shall be maintained with the protected material and copies of print-outs thereof at all times.

5. No other person may be allowed to examine the material without further court order. Examination of the protected material and copies of print-outs thereof shall be done in a secure environment that will not expose the materials to other individuals not listed above.

6. Files contained within the protected material may be duplicated to the extent necessary to prepare the defense of this matter but if duplicated, are subject to the same restraints as the material itself.

7. Any pleadings that include the above-described materials or their contents shall be filed under seal or with appropriate redactions removing personal identifying information.

STIPULATION AND [PROPOSED] PROTECTIVE ORDER

DATED: December 29, 2015

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PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: 1/4/2016

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